

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
WESTERN DIVISION

Devin G. Nunes,)	Case No. 5:19-cv-04064-CJW-MAR
)	
Plaintiff,)	
)	
v.)	
Ryan Lizza and Hearst Magazine Media, Inc.,)	[Jointly Proposed] Scheduling Order and Discovery Plan
)	
Defendants.)	
)	
)	

Counsel for Plaintiff Devin G. Nunes (“Plaintiff”) and counsel for Defendants Ryan Lizza and Hearst Magazine Media, Inc. (“Defendants”) (collectively, the “Parties”), have conferred and, by and through their undersigned counsel, submit the following case information and proposed dates for case management:

1. Did the parties both (a) enter into an agreement during the Rule 26(f) conference resolving all issues relating to initial disclosures, and (b) discuss the preservation, disclosure, and discovery of electronically stored information? **Yes; both parties have already made their initial disclosures.**

2. Deadline for motions to add parties: **March 25, 2022**

3. Deadline for motions to amend pleadings: **March 25, 2022**

4. Expert witnesses disclosed by:

a. Plaintiff: **June 24, 2022**

b. Defendant: **July 25, 2022**

c. Plaintiff Rebuttal: **August 25, 2022**

Note: The parties respectfully request two additional months for each of these expert disclosure deadlines beyond the deadlines contemplated by the Court's worksheet, so that the experts have the benefit of substantial factual discovery having been completed before offering their opinions.

5. Deadline for completion of discovery: **September 23, 2022**. "Completion" means that all written discovery must be propounded and all depositions must be scheduled in time to be completed on or before September 23, 2022.

6. Dispositive motions deadline: **October 25, 2022**

7. Trial ready date: **disputed (see parties' submissions regarding joint trial)**

8. Has a jury demand been filed?: **Yes**

9. Estimated length of trial: **unknown (depends on whether case is tried jointly with *NuStar Farms, LLC et al. v. Lizza et al.*, 5:20-cv-04003-CJW-MAR; see parties' submissions regarding joint trial)**

10. Do the parties unanimously consent to trial, disposition and judgment by a U.S. Magistrate Judge, with appeal to the Eighth Circuit Court of Appeals pursuant to 28 U.S.C. § 636(c)(3)? **No**.

11. Are each of the attorneys in this case admitted to practice in the Northern District of Iowa pursuant to Local Rule 83? **Yes**.

IT IS SO ORDERED this ____ day of _____, 2022.

Mark A. Roberts, United States Magistrate Judge
North District of Iowa

Respectfully Submitted,

Devin G. Nunes,

By: /s/ Steven S. Biss

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Attorneys for Defendants

Certificate of Service

The undersigned certifies that a true copy of **[Jointly Proposed] Scheduling Order and Discovery Plan** was served upon the following parties through the Court's CM/ECF electronic filing system on January 25, 2022.

/s/ Nathaniel S. Boyer

Copy to:

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